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Attorneys for Defendant
LEFRAK ORGANIZATION, INC.

21 MC 102 (AKH)

IN RE: WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NAYIBE PADREDIN,

Plaintiff,

-against-

80 LAFAYETTE ASSOCIATES, LLC, B.R. FRIES & ASSOCIATES, INC., BATTERY PARK CITY AUTHORITY, BLUE MILLENNIUM REALTY LLC, CENTURY 21, INC., EMPIRE STATE PROPERTIES, INC., GRUBB & ELLIS MANAGEMENT SERVICES, HILLMAN ENVIRONMENTAL GROUP, LLC., HUDSON TOWERS HOUSING CO., INC., LEFRAK ORGANIZATION, INC., MAYORE ESTATES LLC, MAYORE ESTATES LLC AND 80 LAFAYETTE ASSOCIATION LLC AS TENANTS IN COMMON, and STONER AND COMPANY, INC.,

Defendants.

Case No.:
07-CV-5306 (AKH)

**NOTICE OF ADOPTION
OF ANSWER TO MASTER
COMPLAINT OF LEFRAK
ORGANIZATION, INC.**

PLEASE TAKE NOTICE THAT defendant, LEFRAK ORGANIZATION, INC., as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts its Verified Master Answer dated July 30, 2007, which was filed in the matter of *In Re: World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). LEFRAK

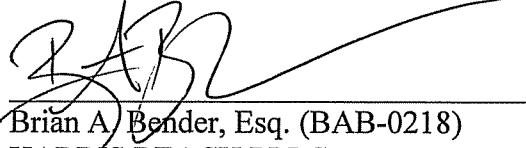
ORGANIZATION, INC. has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (¶ J(2)).

WHEREFORE, LEFRAK ORGANIZATION, INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York
September 10, 2007

Yours etc.,

HARRIS BEACH PLLC



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